

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DEUTSCHE BANK TRUST COMPANY	X	
AMERICAS	:	
	:	Case No.: 08 CV 0955
Plaintiff,	:	
	:	
- against -	:	<b>AFFIDAVIT OF SERVICE UPON</b>
	:	<b>ZAIS OPPORTUNITY MASTER FUND,</b>
LACROSSE FINANCIAL PRODUCTS, LLC, et	:	<b>LTD.</b>
al.,	:	
	:	
Defendants.	:	
	X	

I, Patricia Dawkins, Process Server, do hereby make oath and do solemnly swear:

1. That I am a non-party to this action over the age of 21 years and a resident of the Cayman Islands, which is a territory of the United Kingdom;
2. That I am employed as a clerk by Broadhurst Barristers, a law firm whose business address is 40 Linwood Street, George Town, Grand Cayman, Cayman Islands, and am authorized to serve legal process in the Cayman Islands;
3. That on or about April 7, 2008, I was instructed by Kyle Broadhurst, a barrister and attorney admitted to practice law in the Cayman Islands employed by Broadhurst Barristers, in turn acting upon the instructions of Legal Language Services, an international litigation support firm located in Leawood, Kansas, in turn acting on the instructions of plaintiff's attorneys of the law firm Nixon Peabody LLP, to effect service of the following documents upon defendant Zais Opportunity Master Fund, Ltd. ("Zais"):

- Hague Service Convention "Notice"
- Hague Service Convention "Summary of the Document to be Served" with Attachment A
- Order
- Notice of Motion to File Exhibits under Seal
- Declaration of Christopher M. Mason (with Exhibit 1 & Exhibits A-E)
- Memorandum of Law in Support of Motion to File Exhibits under Seal

- Summons in a Civil Action
  - Interpleader Complaint with Exhibits A-E
  - Individual Practices for Judge Lewis A. Kaplan
  - Individual Practices for Magistrate Judge Debra Freeman
4. That according to the Cayman Islands Registrar of Companies, the registered office and address for service of process upon Zais is c/o Deutsche Bank (Cayman) Limited, Boundary Hall, Cricket Square, 171 Elgin Ave., George Town, Grand Cayman, Cayman Islands (See Cayman Islands Registrar of Companies report, attached hereto as Exhibit A);
  5. That on the 8<sup>th</sup> day of April 2008 at approximately 10:35 a.m., I did personally travel to the above-referenced address at Boundary Hall where I met with Lucy Davies, who identified herself as an office administrator and indicated she was authorized to accept service of process on behalf of Zais; that I handed the documents to her and said, “You are served with legal process on behalf of Zais Opportunity Master Fund, Limited”;
  6. That Ms. Davies accepted the above-mentioned documents and then signed and dated Broadhurst Barristers’ cover letter; that while signing a duplicate copy of the Summons, Ms. Davies said she had to “check in back” to verify she could sign the summons; that Ms. Davies went into an inner office and returned with a gentleman who identified himself as Simon Wetherell, Vice President of Deutsche Bank (Cayman) Limited; that Mr. Wetherell said that he was authorized to accept the documents, but refused to sign the summons confirming receipt; that I indicated that Ms. Davies had already signed the documents and Mr. Wetherell said that Ms. Davies is not a permanent employee;
  7. That Ms. Davies is of Asian descent, in her early 30’s approximately 5’3” tall with a slim build; that Mr. Wetherell is caucasian, early 40’s, approximately 5’9” tall, with a bald head and slim build;
  8. That I believe service upon Zais Opportunity Master Fund, Limited to have been effected in accordance with a method prescribed by the internal laws of the Cayman Islands for civil matters within this jurisdiction and thus in accordance with sub-paragraph (b) of Article 10 of the *Hague*



**EXHIBIT A**

**CAYMAN ISLANDS REGISTRAR OF COMPANIES  
SEARCH REPORT FOR  
ZAIS OPPORTUNITY MASTER FUND, LTD.**



## Search Report

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**Entity Name :** ZAIS Opportunity Master Fund, Ltd.  
**Jurisdiction :** Cayman Islands  
**Registration Number :** 129499  
**Registration Date :** 06 October 2003  
**Entity Type :** EXEMPT  
**Registered Office :** DEUTSCHE BANK (CAYMAN) LIMITED  
PO BOX 1984 GT  
BOUNDARY HALL, CRICKET SQUARE  
171 ELGIN AVE.  
**Status :** ACTIVE

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- INFORMATION REGARDING THE CORPORATE RECORDS AND REGISTERS ARE NOT AVAILABLE FOR PUBLIC INSPECTION
- THIS REPORT DOES NOT CONFIRM THE ENTITY IS IN GOOD STANDING



**EXHIBIT B**

**SIGNED LETTER AND SUMMONS  
CONFIRMING SERVICE**

# BROADHURST BARRISTERS

April 8, 2008

BY HAND

Zais Opportunity Master Fund, Ltd.  
Deutsche Bank (Cayman) Limited  
PO Box 1984 GT  
Boundary Hall, Cricket Square  
171 Elgin Ave.

Dear Sirs,

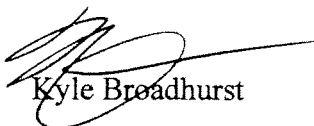
**Re: Deutsche Bank Trust Company Americas v. LaCrosse Financial Products, LLC**

We have been instructed with respect to the service of the following documents upon you:

1. Hague Service Convention "Notice"
2. Hague Service Convention "Summary" with Attachment "A"
3. Order
4. Notice of Motion to File Exhibits under seal
5. Declaration of Christopher M. Mason (with Exhibit 1 & Exhibits A-E)
6. Memorandum of Law in support of Motion to File exhibits under seal
7. Summons in a Civil Action
8. Interpleader Complaint with Exhibits A-E
9. Individual Practices for Judge Lewis A. Kaplan
10. Individual Practices for Magistrate Judge Debra Freeman

The documents have been attached to this letter. We would be grateful if you would confirm receipt by executing this letter and by executing the duplicate copy of the documents also appended hereto.

Yours sincerely,  
**Broadhurst Barristers**

  
Kyle Broadhurst



LUCY DAVIES

06/04/08  
10:35

Attorneys-at-Law